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11 Attorneys for Defendant-Counterclaimant
12 FREESCALE SEMICONDUCTOR, INC.

13
14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **OAKLAND DIVISION**
17

18 MEDIATEK INC.,

19 Plaintiff,

20 v.

21 FREESCALE SEMICONDUCTOR, INC.,

22 Defendant.
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Civil Action No. 4:11-cv-05341 (YGR)

**JOINT STIPULATION TO
FREESCALE'S ADMINISTRATIVE
MOTION TO SEAL FREESCALE
CONFIDENTIAL INFORMATION IN
MEDIATEK'S STIPULATED
ADMINISTRATIVE MOTION FOR
LEAVE TO FILE DOCUMENTS
UNDER SEAL [DKT. NO. 334]**

Hon. Yvonne Gonzalez Rogers

1 Defendant Freescale Semiconductor, Inc. (Freescale) and Plaintiff MediaTek Inc.
2 (MediaTek), through their undersigned counsel, hereby agree and stipulate as follows:

3 WHEREAS Freescale wishes to file an Administrative Motion to Seal Freescale
4 Confidential Information in MediaTek's Stipulated Administrative Motion for Leave to File
5 Documents Under Seal [Dkt. No. 334] in order to file under seal portions of Dkt. No. 334-6 and
6 the entirety of Dkt. No. 334-21;

7 WHEREAS Dkt. Nos. 334-6 and 334-21 contain information designated by Freescale as
8 "Highly Confidential – Attorneys' Eyes Only" pursuant to the Stipulated Amended Protective
9 Order in force in this action;

10 WHEREAS the parties met and conferred on this issue on November 26, 2013;

11 WHEREAS Freescale wishes to maintain the confidentiality of certain information
12 disclosed in Dkt. Nos. 334-6 and 334-21;

13 NOW THEREFORE, pursuant to Local Civil Rule 7-11, Freescale and MediaTek, by and
14 through their respective counsel of record, HEREBY STIPULATE AS FOLLOWS:

15 Dkt. Nos. 334-6 and 334-21 should be filed under seal.

16 IT IS SO STIPULATED.

17 Dated: November 26, 2013

FREESCALE SEMICONDUCTOR, INC.

18 By its attorneys,

19 /s/ Jacob P. Ewerdt

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1 Dated: November 26, 2013

Respectfully submitted,

2 MEDIATEK INC.

3 By its attorneys,

4 /s/ Christopher A. Franklin

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21 **ATTESTATION OF E-FILED SIGNATURE**

22 I, Rudy Y. Kim, am the ECF User whose ID and password are being used to file this
23 Stipulation. In compliance with General Order 45, X.B., I hereby attest that Jacob P. Ewerdt and
24 Christopher A. Franklin have concurred in this filing.

25 Dated: November 26, 2013

/s/ Rudy Y. Kim

Rudy Y. Kim